

Before the
Federal Communications Commission
Washington, D.C. 20554

RECEIVED

JUN 1 1995

In the Matter of)
)
Amendment of Subpart D of)
Part 68 of the FCC's Rules)
and Regulations)

RM - 8621

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY
DOCKET FILE COPY ORIGINAL

REPLY COMMENTS

Pursuant to the Commission's Rules, 47 CFR §1.405, the Telecommunications Industry Association (TIA) respectfully submits these Reply Comments to the Comments filed in response to the Petition for Rulemaking to amend Subpart D of Part 68, 47 CFR §§68.300 - 68.318, and portions of 47 CFR §68.2 in order to harmonize Subpart D with the corresponding Sections of the Canadian certification regulations CS-03.

TIA has received Comments from parties which include manufacturers, a manufacturers' trade association, local exchange carriers, and a test laboratory¹. In review of these Comments, TIA has found unanimous support in favor of the action recommended by the Petition for Rulemaking (Petition). For example, in its Comments on the Petition, AT&T discusses (page 4) a similar effort by Canada to be presented to Canada's Terminal Attachment Program Advisory Committee at its June 1995 meeting, stating that adoption of the re-write is expected at that time and the new Canadian rules should be effective in Canada by the end of 1995. AT&T further states, "The Commission should achieve the same result in the United States by adopting the rules proposed in the Petition as promptly as Commission Procedures permit."² BellSouth, in its Comments, "supports TIA's proposal and, in fact, was active in the lengthy proposal development process.

¹ Comments from AT&T Corporation (AT&T); BellSouth Telecommunications (BellSouth); Communications Certification Laboratory (CCL); Independent Data Communications Manufacturers Association, Incorporated (IDCMA); New England Telephone and Telegraph Company and New York Telephone Company (NYNEX); and Northern Telecom, Incorporated.

² AT&T Comments dated May 1, 1995, page 5.

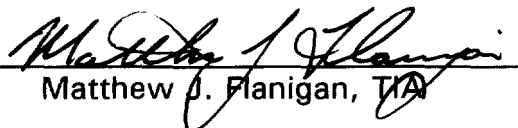
028
CCB

BellSouth believes that consumers will benefit from the greater choice in terminal equipment availability that harmonization of registration requirements may foster."³ CCL, a testing laboratory, states that it "strongly supports the Petition for Rulemaking by the Telecommunications Industry Association (TIA) to harmonize the telecom terminal attachment requirements in the United States and Canada by amending Part 68, Subpart D."⁴ IDCMA, a manufacturers' trade association comprised of major manufacturers of equipment used to effectuate and manage data communications, states that "the time has now come to adapt the Part 68 registration program to harmonize United States and Canadian registration/certification requirements."⁵ In its letter, Northern Telecom "supports this Petition without reservation, and urges the Commission to commence a rulemaking"⁶ And in Comments submitted by NYNEX, NYNEX states that it "believes the proposed amendments are in the public interest because they will encourage free trade, lead to greater efficiencies in manufacturing terminal equipment, assure the continued reliability of the public switched network, and streamline the Part 68 registration process."⁷

In conclusion, in light of the unanimous support received by TIA on this Petition and given that there are no new issues or issues of controversy on the record, TIA requests that the Commission expeditiously proceed to amend its rules. Given the fact that TIA's processes have already enabled extensive public input to the proposed changes, TIA further requests that the Commission move right to a final Order and omit the Notice of Proposed Rulemaking phase, as permitted by CFR 47, §§1.407 and 1.412(c).

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY
ASSOCIATION**

BY: 
Matthew J. Flanigan, TIA

³ BellSouth Comments, dated May 1, 1995, pages 1 and 2.

⁴ CCL Comments, dated April 27, 1995, page 1.

⁵ IDCMA Comments, dated May 1, 1995, page 2.

⁶ Northern Telecom Comments, dated May 1, 1995, page 1.

⁷ NYNEX Comments, dated May 1, 1995, page 1.

Dan Bart, Vice President Standards
and Technology, EIA/TIA

Paul H. Vishny, General Counsel

2500 Wilson Boulevard, Suite 300
Arlington, VA 22201-3836

June 1, 1995

703-907-7703

CERTIFICATE OF SERVICE

I, Stephanie F. Jones, do hereby certify that the Telecommunications Industry Association's Reply Comment's in RM-8621 have been served on this the 1st day of June, 1995, by first-class prepaid postage, to the persons on the attached list.

Stephanie F. Jones

Dated: May 24, 1995

**Ernest A. Gleit
Mark C. Rosenblum
Kathleen F. Carroll
Attorneys for AT&T
Room 3252F3
295 N. Maple Avenue
Basking Ridge, New Jersey 07920**

**M. Robert Sutherland
A. Kirven Gilbert III
Attorneys for Bellsouth
4300 Southern Bell Center
675 W. Peachtree Street, N.E.
Atlanta, GA 30375**

**Herbert Marks
Jonathan Jacob Nadler
Jeffrey A. Campbell
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, N.W.
P.O. Box 407
Washington, D.C. 20044**

**Edward R. Wholl
Carlos J. Sandoval
Attorneys for NYNEX
1111 Westchester Avenue
White Plains, NY 10604**

**William S. Hurst
Vice President
CCL
1940 West Alexander Street
Salt Lake City, UT 84119-2039**